

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

NSTAR ELECTRIC, D.T.E. 03-121

**FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
THE DIVISION OF ENERGY RESOURCES**

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to the Division of Energy Resources the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to the Division of Energy Resources in this proceeding.

1. "DOER@ means The Division of Energy Resources, its employees, consultants, and attorneys.
2. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number(for example, DTE-DOER-1-1), the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
3. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
4. These requests shall be deemed continuing so as to require further supplemental responses if DOER or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
5. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
6. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche,

computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

7. If DOER finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
9. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) John Cope-Flanagan, Legal Division; (3) Jeff Hall, Rates and Revenue Requirements Division; (4) Claude Francisco, Rates and Revenue Requirements Division; (5) Sean Hanley, Rates and Revenue Requirements Division; and (6) Xuan Yu, Rates and Revenue Requirements Division.

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**FIRST SET OF INFORMATION REQUESTS OF
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THE DIVISION OF ENERGY RESOURCES**

Information Requests

Information Requests Related to the Pre-filed Testimony of Alvaro E. Pereira

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| DTE-DOER-1-1 | Refer to the Direct Testimony of Alvaro E. Pereira at 11, lines 20-25. Please discuss the proposition that, from a cost-causation perspective, the difference between the treatment of customers that reduce usage through demand-side management and those that use a DG facility could lie in the fact that those customers that reduce usage via demand-side management have permanently removed load from the utility system, while those customers using DG will likely need to use the utility system at some point in the future. |
| DTE-DOER-1-2 | Refer to the Direct Testimony of Alvaro E. Pereira at 13, lines 2-8. Please explain how these characteristics should be accounted for in the design of standby rates. Please provide concrete numbers to substantiate your response. |

Dated: March 26, 2004